RECEIVED
CENTRAL FAX CENTER
OCT 19 2004

OFFICIAL

CARDINAL LAW GROUP

1603 Orrington Avenue/Suite 2000
Evanston, Illinois 60201
Telephone 847 – 905 - 7111
Facsimile 847 – 905 – 7113

Date:	OCTOBER 18, 2004
To:	EXAMINER KIMBERLY D. NGUYEN U.S. PATENT AND TRADEMARK OFFICE
Fax #:	(703) 872-9319
From:	FRANK C. NICHOLAS
Phone #:	(847) 424-2521
Client/Matter No.:	FR 000130 (7790/194)
# of Pages:	20

(including cover sheet)

IF YOU HAVE ANY PROBLEMS RECEIVING THIS MESSAGE, PLEASE CALL 847/905-7111, Ext. 112 AND ASK FOR JENNIFER CRUZ.

THIS MESSAGE IS INTENDED ONLY FOR THE INDIVIDUAL OR ENTITY TO WHICH IT IS ADDRESSED. IT MAY CONTAIN PRIVILEGED, CONFIDENTIAL, ATTORNEY WORK PRODUCT, OR TRADE SECRET INFORMATION WHICH IS EXEMPT FROM DISCLOSURE UNDER APPLICABLE LAWS. IF YOU ARE NOT THE INTENDED RECIPIENT, OR AN EMPLOYEE OR AGENT RESPONSIBLE FOR DELIVERING THE MESSAGE TO THE INTENDED RECIPENT, YOU ARE HEREBY NOTIFIED THAT ANY DISSEMINATION, DISTRIBUTION, OR COPYING OF THIS MESSAGE IS STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS MESSAGE IN ERROR, PLEASE NOTIFY US IMMEDIATELY BY TELEPHONE AND RETURN THE ORIGINAL MESSAGE (AND ALL COPIES) TO US BY MAIL AT THE ABOVE ADDRESS. WE WILL REIMBURSE YOU FOR POSTAGE.

MEMORY TRANSMISSION REPORT

TIME : OCT-18-04 02:56PM
TEL NUMBER1: +18479057113
TEL NUMBER2:
NAME : CLG FAX

FILE NUMBER	:	387
DATE	:	OCT-18 02:52PM
TO	:	17038729319
DOCUMENT PAGES	:	20
START TIME	:	OCT-18 02:53PM
END TIME	:	OCT-18 02:56PM
SENT PAGES	:	20
FILE NUMBER	:	387

*** SUCCESSFUL TX NOTICE ***

RECEIVED
CENTRAL FAX CENTER
OCT 19 2004

OFFICIAL

CARDINAL LAW GROUP
1603 Orrington Avenue/Suite 2000
Evanston, Illinois 60201
Telephone 847 – 905 - 7111
Facsimile 847 – 905 – 7113

Date:	OCTOBER 18, 2004
To.	EXAMINER KIMBERLY D. NGUYEN U.S. PATENT AND TRADEMARK OFFICE
Fax #:	(703) 872-9319
From: Phone #:	FRANK C. NICHOLAS (847) 424-2321
Client/Matter No.:	FR 000130 (7790/194)
# of Pages:	20

(including cover sheet)

IF YOU HAVE ANY PROBLEMS RECEIVING THIS MESSAGE PLEASE CALL (847/905-7111 Ext 113 AND ASK FOR JENNIFER HRUZ

THIS MESSAGE IS INTENDED ONLY FOR THE INDIVIDUAL OR ENTITY TO WHICH IT IS ADDRESSED. IT MAY CONTAIN PRIVILEGED, CONFIDENTIAL ATTORNEY WORK PRODUCT OR TRADE SECRET INFORMATION WHICH IS EXEMPT FROM DISCLOSURE UNDER APPLICABLE LAW. IF YOU ARE NOT THE INTENDED RECIPIENT OR AN EMPLOYEE OR AGENT RESPONSIBLE FOR DELIVERING THIS MESSAGE TO THE INTENDED RECIPIENT, YOU ARE HEREBY NOTIFIED THAT ANY DISSEMINATION, DISTRIBUTION OR COPYING OF THIS MESSAGE IS STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS MESSAGE IN ERROR, PLEASE NOTIFY US IMMEDIATELY BY TELEPHONE AND RETURN THE ORIGINAL MESSAGE (AND ALL COPIES) TO US BY MAIL AT THE ABOVE ADDRESS. WE WILL REIMBURSE YOU FOR POSTAGE.

PTO/SB/21 (Modified) Approved for use through xx/xx/xxxx. OMB 0651-xxxx. Patent and Trademark Office: U.S. DEPARTMENT OF COMMERCE
Under the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless it displays a valid OMB control number.

TRANSMITTAL FORM

(to be used for all correspondence after initial filing)

Attorney Docket No	FR 000130 (7790/194)
Application Number	10/015,965
Filing Date	NOVEMBER 30, 2001
First Named Inventor	YANNICK VINCENT
Group Art Unit	2878
Examiner	NGUYEN, KIMBERLY D

ENCLOSURES *(check all that apply)*

☐	Amendment	☐	Assignment Papers *(for an Application)*	☐	Appeal Communication to Board of Appeals and Interferences
☐	After Final	☐	Drawings.	☒	Reply Brief
☐	Affidavits/declaration(s)	☐	After Allowance Communication to Group		
☐	Status Letter	☐	Petition Routing Slip (PTO/SB/69) and Accompanying Petition	☐	Proprietary Information
☐	Petition for Extension of Time Request	☐	To Convert a Provisional Application	☐	Post Card Receipt
☐	Express Abandonment Request	☐	Power of Attorney, Revocation Change of Correspondence Address	☐	Additional Enclosure(s) *(please identify below)*
☐	Information Disclosure Statement, PTO-1449, an	☐	Terminal Disclaimer	☐	
☐	Certified Copy of Priority Document(s)	☐	Small Entity Statement	☐	
☐	Response to Missing Parts/ Incomplete Application	☐	Request of Refund	☐	

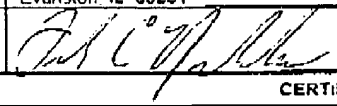
☒ The Commissioner is hereby authorized to charge any fees which may be required, or credit any overpayment, to Deposit Account No. 50-1713. A duplicate copy of this sheet is enclosed.

☒ I hereby petition under 37 CFR § 1.136(a) for any extension of time required to ensure that this paper is timely filed. Please charge any associated fees which have not otherwise been paid to Deposit Account No. 50-1713. A duplicate copy of this sheet is enclosed.

CALCULATION OF FEE

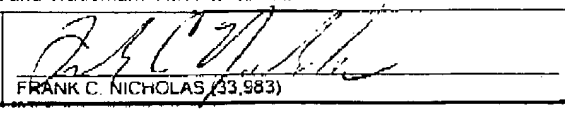
	Claims After Amendment		Highest No Previously Paid For	Present Extra	Small Entity Rate	Small Entity Add'l Fee	or	Large Entity Rate	Large Entity Add'l Fee
Total		Minus		0	x $9=	0		x $18=	
Indep.		Minus		0	x $44	0		x $88	
First Presentation of Multiple Dep. Claim					+$150	—		+ $300=	
					total add'l fee	$ 0		total add'l fee	$

SIGNATURE OF APPLICANT, ATTORNEY, OR AGENT

Firm or Individual name	FRANK C. NICHOLAS Registration No. 33,983 CARDINAL LAW GROUP 1603 Orrington Avenue, Suite 2000 Evanston, IL 60201		
Signature		Date	October 18, 2004

CERTIFICATE OF FACSIMILE

I hereby certify that this correspondence is being transmitted by facsimile to (703) 872-9319 to the U.S. Patent and Trademark Office on this date: October 18, 2004

Signature	 FRANK C. NICHOLAS (33,983)	Date:	October 18, 2004

PTO/SB/21 (10-97) Approved for use through 9/30/00. OMB 0651-0031 Patent and Trademark Office: U.S. DEPARTMENT OF COMMERCE
Under the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless it displays a valid OMB control number.

TRANSMITTAL FORM

(to be used for all correspondence after initial filing)

Attorney Docket No	FR 000130 (7790/194)
Application Number	10/015 965
Filing Date	NOVEMBER 30, 2001
First Named Inventor	YANNICK VINCENT
Group Art Unit	2876
Examiner	NGUYEN, KIMBERLY D

ENCLOSURES *(check all that apply)*

☐ Amendment	☐ Assignment Papers *(for an Application)*	☐ Appeal Communication to Board of Appeals and Interferences
☐ After Final	☐ Drawings	☒ Reply Brief
☐ Affidavits/declaration(s)	☐ After Allowance Communication to Group	
☐ Status Letter	☐ Petition Routing Slip (PTO/SB/69) and Accompanying Petition	☐ Proprietary Information
☐ Petition for Extension of Time Request	☐ To Convert a Provisional Application	☐ Post Card Receipt
☐ Express Abandonment Request	☐ Power of Attorney, Revocation Change of Correspondence Address	☐ Additional Enclosure(s) *(please identify below)*
☐ Information Disclosure Statement, PTO-1449, an	☐ Terminal Disclaimer	☐
☐ Certified Copy of Priority Document(s)	☐ Small Entity Statement	☐
☐ Response to Missing Parts/ Incomplete Application	☐ Request of Refund	☐

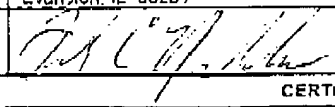
☒ The Commissioner is hereby authorized to charge any fees which may be required, or credit any overpayment, to Deposit Account No 50-1713 A duplicate copy of this sheet is enclosed.

☒ I hereby petition under 37 CFR § 1.136(a) for any extension of time required to ensure that this paper is timely filed. Please charge any associated fees which have not otherwise been paid to Deposit Account No 50-1713 A duplicate copy of this sheet is enclosed.

CALCULATION OF FEE

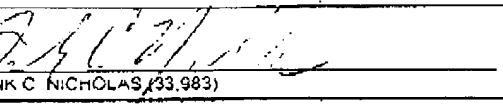
	Claims After Amendment		Highest No Previously Paid For	Present Extra	Small Entity Rate	Small Entity Add'l Fee	or	Large Entity Rate	Large Entity Add'l Fee
Total		Minus		0	x $9=	0		x $18=	
Indep		Minus		0	x $44	0		x $88	
First Presentation of Multiple Dep Claim					+ $150	—		+ $300=	
					total add'l fee	$ 0		total add'l fee	$

SIGNATURE OF APPLICANT, ATTORNEY, OR AGENT

Firm or Individual name	FRANK C. NICHOLAS Registration No. 33,983 CARDINAL LAW GROUP 1603 Orrington Avenue, Suite 2000 Evanston, IL 60201		
Signature		Date	October 18, 2004

CERTIFICATE OF FACSIMILE

I hereby certify that this correspondence is being transmitted by facsimile to (703) 872-9319 to the U.S. Patent and Trademark Office on this date: October 18, 2004

Signature	 FRANK C. NICHOLAS (33,983)	Date	October 18, 2004

Certificate of Facsimile
I hereby certify that this correspondence is being transmitted by facsimile to (703) 872-9319 to the U.S. Patent and Trademark Office October 18, 2004
(Date of Deposit)

FRANK C. NICHOLAS (33,983)
Name of applicant, assignee or registered representative

Signature

October 18, 2004
Date of Signature

RECEIVED
CENTRAL FAX CENTER
OCT 19 2004

PATENT
Case No. FR 000130
(7790/194)

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE BOARD OF PATENT APPEALS AND INTERFERENCES

In re patent application of:

YANNICK VINCENT

Serial No.: 10/015,965

Filed: NOVEMBER 30, 2001

For: DATA-PROCESSING SYSTEM

Examiner: Nguyen, Kimberly D.

Group Art Unit: 2876

REPLY BRIEF

Mail Stop **Appeal Brief - Patents**
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

Dear Sir:

Appellant herewith respectfully presents a Reply Brief as follows:

BEST AVAILABLE COPY

TABLE OF CONTENTS

		Page
1.	REAL PARTY IN INTEREST	3
2.	RELATED APPEALS AND INTERFERENCES	4
3.	STATUS OF CLAIMS	5
4.	STATUS OF AMENDMENTS	6
5.	SUMMARY OF CLAIMED INVENTION	7
6.	GROUNDS OF REJECTION TO BE REVIEWED ON APPEAL	8
7.	ARGUMENT	9
8.	CLAIMS APPENDIX	20
9.	EVIDENCE APPENDIX	None
10.	RELATED PROCEEDINGS APPENDIX	None

1. **REAL PARTY IN INTEREST**

A statement of the real party in interest in contained in the Appeal Brief filed May 11, 2004.

2. **RELATED APPEALS AND INTERFERENCES**

Appellant and the undersigned attorney are not aware of any other appeals or interferences which will directly affect or be directly affected by or having a bearing on the Board's decision in the pending appeal.

3. **STATUS OF CLAIMS**

A statement of the status of the claims is in contained in the Appeal Brief filed May 11, 2004.

4. **STATUS OF AMENDMENTS**

A statement of the status of the amendments is in contained in the Appeal Brief filed May 11, 2004.

5. **SUMMARY OF THE INVENTION**

A statement of the summary of the invention is in contained in the Appeal Brief filed May 11, 2004.

6. **GROUNDS OF REJECTION TO BE REVIEWED ON APPEAL**

Pending claims 1, 3, 5, 7 and 9 stand finally rejected under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 6,574,776 to *Chiang*.

Pending claims 2 and 6 stand finally rejected under 35 U.S.C. §103(a) as being unpatentable over *Chiang* in view of U.S. Patent Publication No. 2003/0004891 to *Van Rensberg*.

Pending claims 4 and 8 stand finally rejected under 35 U.S.C. §103(a) as being unpatentable over *Chiang* in view of U.S. Patent No. 5,978,822 to *Muwafi*.

7. **ARGUMENT**

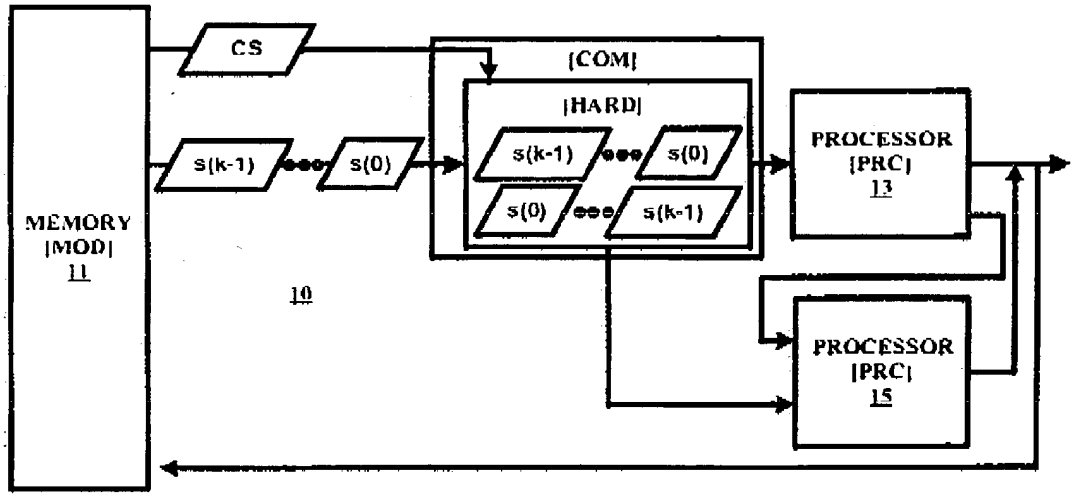
The Appellant respectfully asserts that a careful review of the Examiner's Answer reveals that Examiner Nguyen does not appreciate the scope of independent claims 1, 5 and 9, and does not understand the teachings of *Chiang*.

First, the scope of independent claims 1 and 5 encompasses "a communication device [COM] communicating with an electronic module [MOD] intended to send a convention signal to said microprocessor", and "a hardware circuit [HARD] allowing an inversion of an order of bits of a word as a function of a value of the convention signal during a transfer of the word between said electronic module [MOD] and said microprocessor [PRC]", and the scope of independent claim 9 encompasses "a communication device [COM] for communicating a contention signal and a word to said hardware circuit [HARD] from one of a microprocessor [PRC] and an electronic module [MOD]" and "wherein said hardware circuit includes means for implementing one of a direct convention and an indirect convention of an order of bits of the word as a function of a value of the convention signal".

Second, *Chiang* teaches a modified procedure for using an array of data elements (k=0, 1, . . . , 1117) that are received separately at an EDC processor 13 (FIG. 1) and at an ECC P-parity processor 15 (FIG 1), and processed in parallel in the two processors to compute an EDC error detection term and, simultaneously, to compute two ECC P-parity syndromes s0 and s1. The procedure used at the EDC processor 13 computes the EDC

term by receiving the sequence {s(k)} of data elements (k=0, 1, . . . , 1117) in serial order and computing the EDC factor as the data elements are received. The procedure used in parallel at the ECC processor 15 computes components the two ECC syndromes as the data elements are received in serial order. See, *Chiang* at column 1, lines 33-45.

In view of the facts that (1) the scope of independent claims 1, 5 and 9 encompass a conditional inversion/convention of bits that is not performed during a transfer of bits to or from the processor, and (2) *Chiang* requires a serial reading of data elements s(0)...s(k-1) from memory 11 to processors 13 and 15, *Chiang* would have to teach a device such as the device 10 illustrated below.



Device 10 as shown includes a hardware circuit [HARD] that reads all of the data elements s(0)...s(k-1) from memory [MOD] 11, and thereafter either serially transfers data elements s(0).. s(k-1) to processors 13 and 15 as required by *Chiang* or inverts data elements to s(k-1)...s(0) per a convention signal CS prior to serially transferring data elements s(k-1)...s(0) to processors 13 and 15 as would be required by *Chiang* if Chiang taught an inversion of data elements s(0)...s(k-1) prior to being serially transferred to processors 13 and 15.

Clearly, device 10 is within the scope of independent claims 1, 5 and 9, because any possible inversion of the data elements occurs during the transfer of the data elements from memory 11 to processor 13. Just as equally clear is the fact the *Chiang* teaches away from device 10 or any other device within the scope of independent claims 1, 5 and 9 by teaching a EDC error detection and an ECC P-parity syndromes s0 and s1 generation that are based on a serial transfer of data elements s(0)....s(k-1) from memory 11 to processors 13 and 15 that must not be inverted as the data elements s(0)....s(k-1) are serially transferred from memory 11 to processors 13 and 15.

To support his untenable rejection of independent claims 1, 5 and 9 as being anticipated by *Chiang*, Examiner Nguyen improperly asserts that an EDC inverter (FIG. 7) within processor 13, which "conditionally" inverts a block of data elements "during" the serial transfer of the block of the data elements from memory 11 to processor 13, anticipates the hardware circuit [HARD] as recited in independent claims 1, 5 and 9. However, a proper understanding of *Chiang* reveals the fact that the EDC inverter within processor 13 "unconditionally" inverts a block of data elements "after", not during, the serial transfer of the block of the data elements from memory 11 to processor 13, and therefore does not anticipate the hardware circuit [HARD] as recited in independent claims 1, 5 and 9.

Furthermore, in the Appeal Brief, the Appellant provided a SUMMARY OF THE INVENTION as mandated by the regulations, and provided an ARGUMENTS as mandated the regulations. A careful review of the Appeal Brief reveals the fact that, in supporting the arguments as to why claims 1-9 are patentable over *Chiang*, the Appellant DID NOT recite any portion of the SUMMARY OF THE INVENTION in the ARGUMENTS as improperly and inappropriately asserted by Examiner Nguyen in section (*11*) 4.of the Examiner's Answer.

Dated **October 18, 2004**

Respectfully submitted,
Yannick Vincent

PHILIPS INTELLECTUAL PROPERTY
& STANDARDS
P.O. Box 3001
Briarcliff, New York 10510
(914) 333-9606

Jack D. Slobod
Registration No. 26,236
Attorney for Appellant

CARDINAL LAW GROUP
Suite 2000
1603 Orrington Avenue
Evanston, Illinois 60201
Phone: (847) 905-7111
Fax. (847) 905-7113

Frank C. Nicholas
Registration No. 33,983
Attorney for Appellant

CLAIMS APPENDIX

1. A data-processing system, comprising:

a microprocessor [PRC];

a communication device [COM] communicating with an electronic module [MOD] intended to send a convention signal to said microprocessor; and

a hardware circuit [HARD] allowing an inversion of an order of bits of a word as a function of a value of the convention signal during a transfer of the word between said electronic module [MOD] and said microprocessor [PRC].

2. The data-processing system as claimed in claim 1, wherein said electronic module [MOD] is a Subscriber Identity Module card.

3. The data-processing system as claimed in claim 1, wherein said hardware circuit [HARD] allows inversion of the value of the bits of the word as a function of the value of the convention signal.

4. The data-processing system as claimed in claim 1, wherein said hardware circuit [HARD] includes:

a switch [SWHMP, SWHPM];

a right shift register [RXMP, RYPM] electrically connected to said switch; and

a left shift register [RYMP, RXPM] electrically connected to said switch.

5. A terminal, comprising:

a microprocessor [PRC];

a communication device [COM] communicating with an electronic module [MOD] intended to send a convention signal to said microprocessor; and

a hardware circuit [HARD] allowing an inversion of an order of bits of a word as a function of a value of the convention signal during a transfer of the word between said electronic module [MOD] and said microprocessor [PRC].

6. The terminal as claimed in claim 5, wherein said electronic module [MOD] is a Subscriber Identity Module card.

7. The terminal as claimed in claim 5, wherein said hardware circuit [HARD] allows inversion of the value of the bits of the word as a function of the value of the convention signal.

8. The terminals as claimed in claim 5, wherein said hardware circuit [HARD]includes:

a switch [SWHMP, SWHPM];

a right shift register [RXMP, RYPM] electrically connected to said switch; and

a left shift register [RYMP, RXPM] electrically connected to said switch.

9. A data-processing system, comprising:

a hardware circuit [HARD];

a communication device [COM] for communicating a contention signal and a word to said hardware circuit [HARD] from one of a microprocessor [PRC] and an electronic module [MOD]; and

wherein said hardware circuit includes means for implementing one of a direct convention and an indirect convention of an order of bits of the word as a function of a value of the convention signal.

EVIDENCE APPENDIX

None.

RELATED PROCEEDINGS APPENDIX

None.

This Page is Inserted by IFW Indexing and Scanning Operations and is not part of the Official Record

BEST AVAILABLE IMAGES

Defective images within this document are accurate representations of the original documents submitted by the applicant.

Defects in the images include but are not limited to the items checked:

- ☐ BLACK BORDERS
- ☐ IMAGE CUT OFF AT TOP, BOTTOM OR SIDES
- ☐ FADED TEXT OR DRAWING
- ☐ BLURRED OR ILLEGIBLE TEXT OR DRAWING
- ☐ SKEWED/SLANTED IMAGES
- ☐ COLOR OR BLACK AND WHITE PHOTOGRAPHS
- ☐ GRAY SCALE DOCUMENTS
- ☑ LINES OR MARKS ON ORIGINAL DOCUMENT
- ☐ REFERENCE(S) OR EXHIBIT(S) SUBMITTED ARE POOR QUALITY
- ☐ OTHER: _____

IMAGES ARE BEST AVAILABLE COPY.
As rescanning these documents will not correct the image problems checked, please do not report these problems to the IFW Image Problem Mailbox.